

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

WILMA PATRICIA PARRA,)
Plaintiff,)
)
v.) Case No.: 2:23-CV-70
)
WORLD LEARNING, INC.,)
Defendant.)

**DEFENDANT'S STIPULATED MOTION TO FURTHER EXTEND
TIME TO RESPOND TO COMPLAINT**

Pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure and Local Rule 7, Defendant World Learning Inc. and Plaintiff Wilma Parra hereby stipulate and move to extend the deadline for Defendant to respond to Plaintiff's Complaint by 18 days, until and including Friday, June 16, 2023. Good cause exists for this extension of time, as translating and assessing the multiple provisions of Bolivian law alleged in the Complaint sufficiently to formulate an appropriate response is requiring more time than was initially anticipated. The requested extension is not for delay or for any improper purpose, and no parties will be prejudiced by this extension. Defendant's counsel and Plaintiff's counsel have conferred and agreed to this extension.

Accordingly, Defendant and Plaintiff respectfully request that the Court enter an order extending the time for Defendants to respond to the Complaint until and including June 16, 2023.

DATED at Burlington, Vermont this 30th day of May, 2023.

WORLD LEARNING, INC.

BY: PAUL FRANK + COLLINS P.C.

By: /s/ Stephen D. Ellis

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DATED at Burlington, Vermont, this 30th day of May, 2023.

WILMA PATRICIA PARRA

BY: MONTROLL, OETTINGER &
BARQUIST, P.C.

By: /s/ Evan Barquist

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